Remarks

Claims 1-7 are rejected under 35 USC 102(b) as being anticipated by Rike. Applicant respectfully traverses this rejection as the Examiner has failed to establish a prima facia case for rejection of Claims 1-7 under 35 USC 102(b).

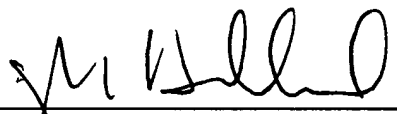
The examiner appears to be misinterpreting Rike. The motors 20 and 80 run in series, and the motor 80 may be run separately from motor 20, but there is no suggestion that the motor 20 runs in parallel. Accordingly, claim 1, and therefore claim claims 1 - 3 and 6 are patentable over Rike.

The rejection of claims 4 - 7 is moot since the claims are cancelled.

Conclusion

Applicant believes the application is in condition for allowance and respectfully requests the same. If the Examiner is of a differing opinion he/she is hereby requested to conduct a telephonic interview with the undersigned attorney.

Respectfully submitted this 1st day of April, 2003.



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AMENDED PARAGRAPH 13 - **AMENDMENT INCORPORATED**
MADE IN RESPONSE TO OFFICE ACTION DATED December 2, 2002

-- 13 Referring to Fig. 1, there is shown a service rig 10 with a conventional mast 12 from which is suspended a continuous feed injection unit 14 by the travelling block 11. A hydraulic power supply 16 for conventional power tongs (not shown) are provided adjacent the mast 12. Tong hoses 18 lead out from the power supply 16 to the rig 10. The continuous feed injection unit 14, see particularly Fig. 1A, includes a pair of hydraulic motors 20, 21 (Fig. 2) and cooperating continuous chains 22, 23 connected to be driven by the hydraulic motors 20, 21 through shafts 15 of conventional gear reducers (not shown) and sprockets 17. The continuous chains 22, 23 include conventional gripper pads 19 for gripping continuous well string. The hydraulic power supply 16 for the power tongs is connected to provide pressurized fluid to the hydraulic motors 20, 21. A guide 24 provides continuous well string (not shown) from a conventional carousel (not shown) to the continuous chains 22, 23. Squeeze cylinders 86 squeeze the continuous chains 22, 23 between two free wheeling chain blocks 25, 26, by moving the chain block 25 laterally towards the fixed chain block 26. The chain block 25 is mounted on the cylinders 86. The squeeze cylinders preferably excerpt a high pressure in the order of 120,000 psi to grip and hold continuous rod. A lower pressure is used for coiled tubing. Chain tension cylinders 100, 101 are connected to sprockets 103, 102 respectively to maintain tension in the chain. The gripper blocks 19 and chains 22, 23 are conventional chains. –

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AMENDED PARAGRAPH 16 - **AMENDMENT INCORPORATED**
MADE IN RESPONSE TO OFFICE ACTION DATED December 2, 2002

-- 16 Flow from flow divider 32 is directed along line 60 through check valves 62 to accumulators 64 and 66 in the auxiliary safety system 34. An unloading valve 61 is provided on the auxiliary line 60 to direct flow to the return 42 when high pressure is sensed on line 63. Line 60 provides control fluid through lines 70 and 72 to the control port 76 on directional control valve 48. Flow to the directional control valve 48 is controlled by manual operation of valve 74 on line 72. Fluid along line 70 is also provided under control of manual directional control valve 84 to squeeze cylinders 86, which provide the gripping force for the grippers on the chains 22, 23. To prevent damage from running oversized rod through the grippers, extra relief is provided on line 88 by relief valve 90. --

Proposed changes
Approved JB
5/5/03

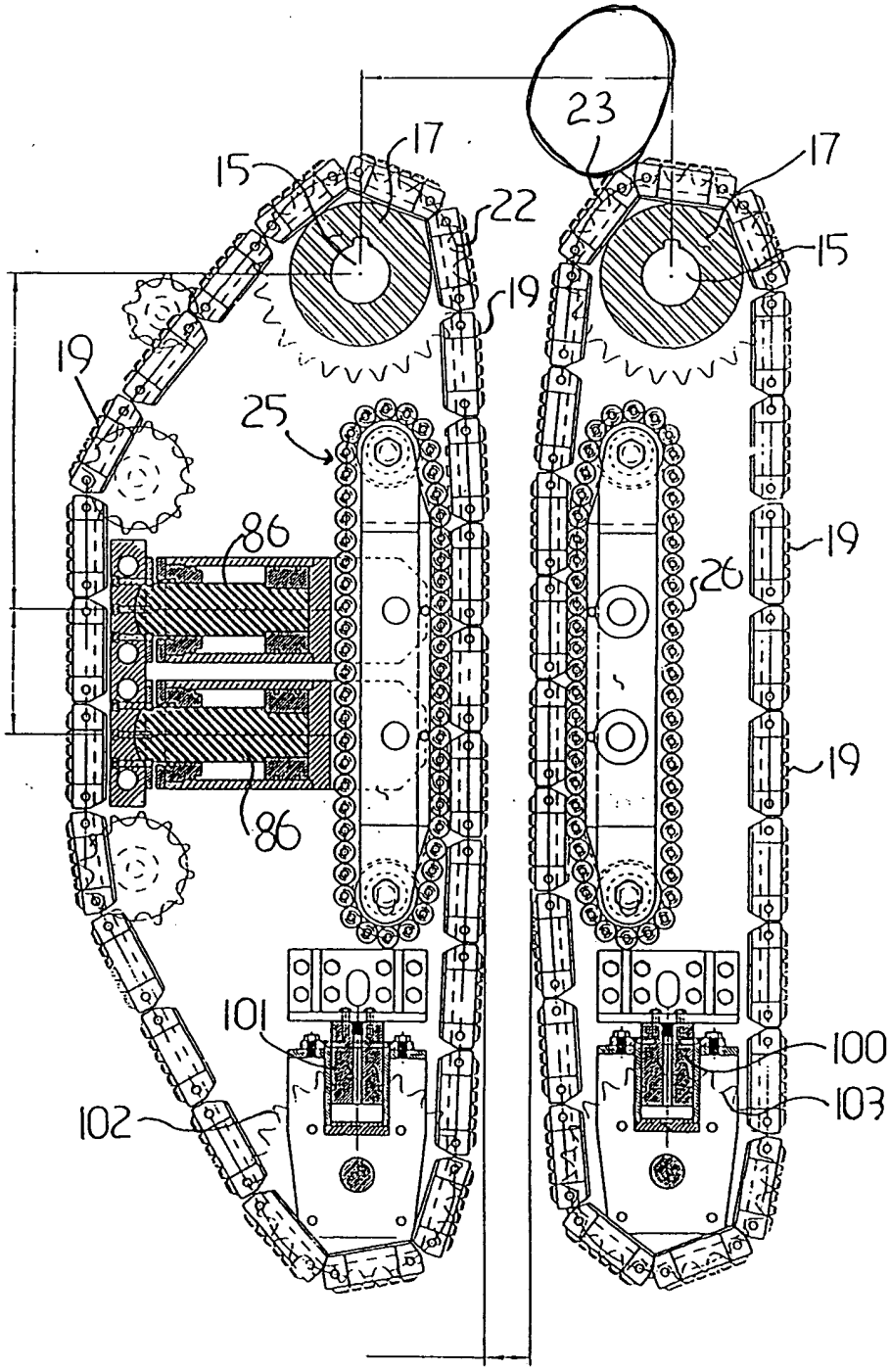

FIGURE 1A

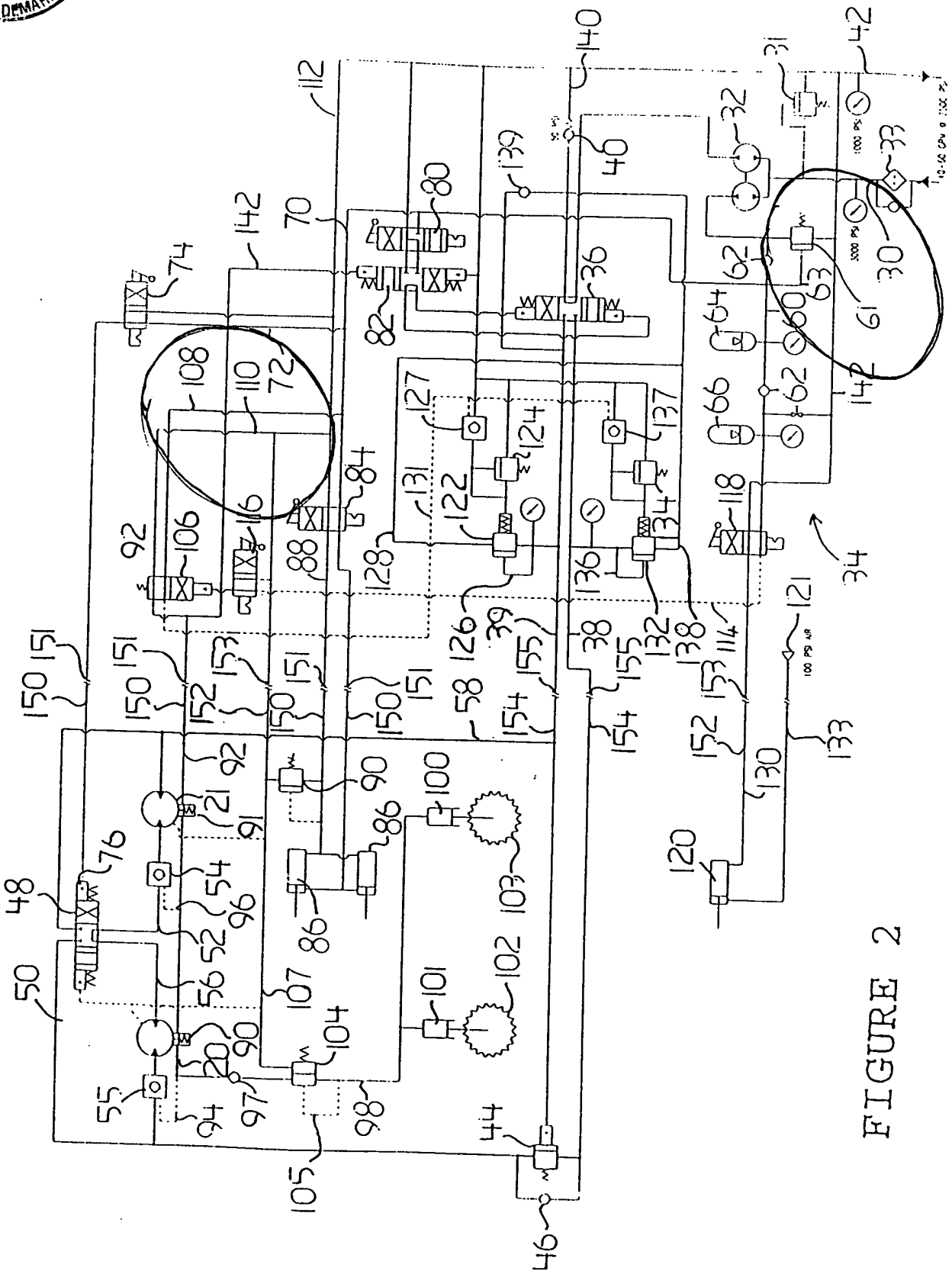

FIGURE 2

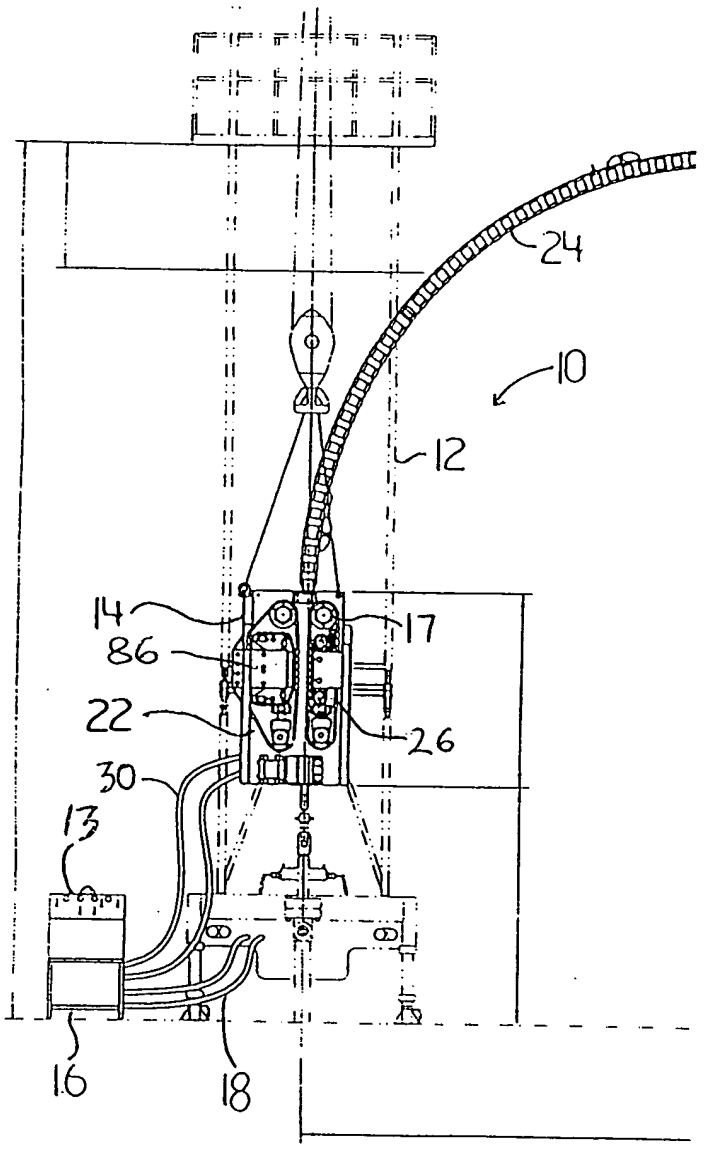

FIGURE 1

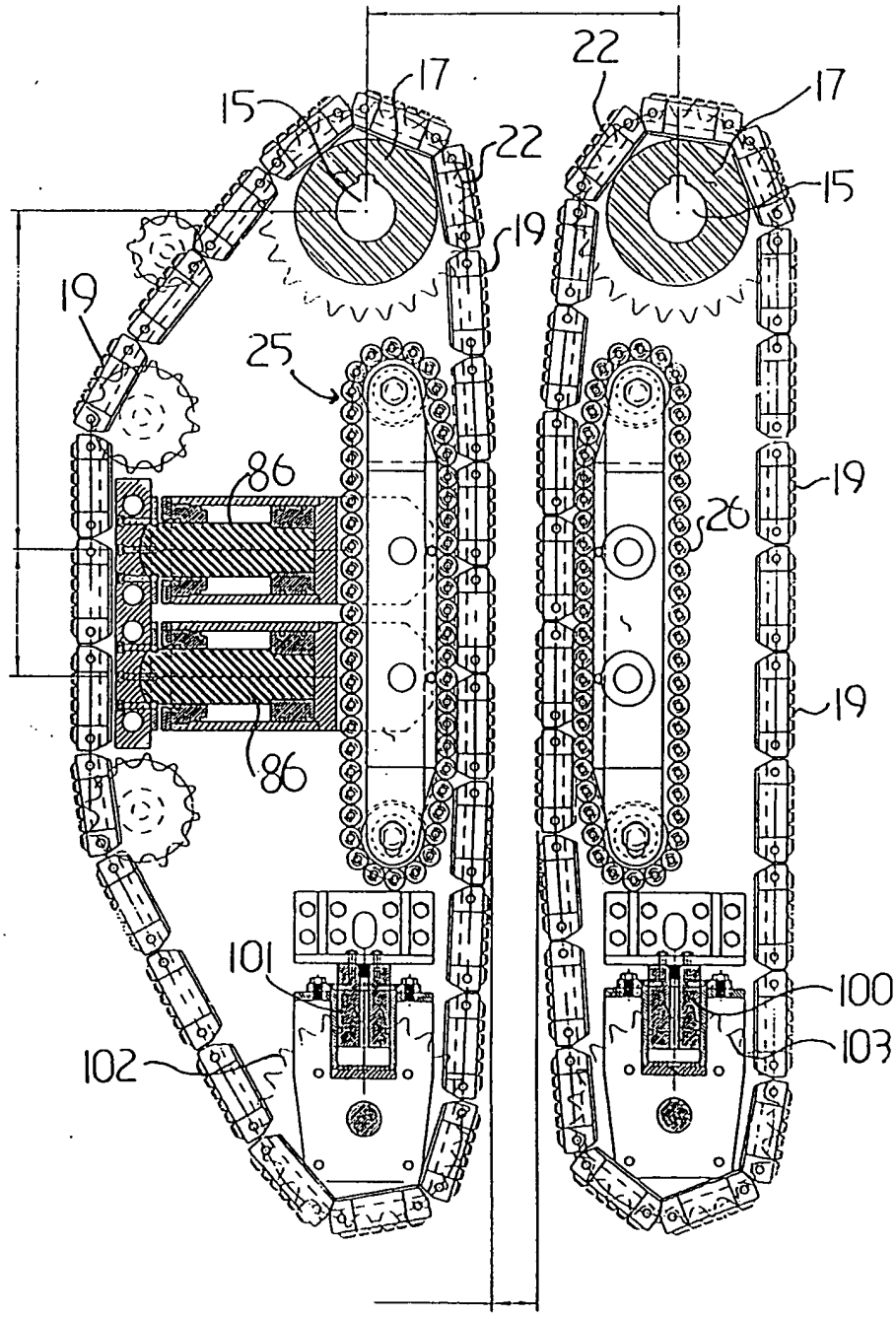

FIGURE 1A

FIGURE 2